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July 8, 2020

**MEMO ENDORSED**

**VIA ECF**

The Honorable Valerie E. Caproni  
United States District Judge  
United States District Court for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: Neil Abromavage v. Deutsche Bank Securities Inc. et al (1:18-cv-06621)

Dear Judge Caproni:

We represent Defendants Deutsche Bank Securities Inc. ("DBSI"), Jeffrey Bunzel and Mark Hantho (collectively, "Defendants") in the above-referenced case. After consulting with Plaintiff's counsel, who does not object to this request, Defendants submit this request for a short, one-week adjournment of the briefing schedule for Defendants' anticipated motion for summary judgment (the "Motion"). The present schedule, set by the Court in its June 8, 2020 Order [Dkt. No. 50], provides that the Motion shall be made by July 10, 2020, opposition shall be filed by August 14, 2020 and reply filed by September 3, 2020. We request a one-week adjournment of all deadlines, so that the Motion shall be made by July 17, 2020, opposition shall be filed by August 21, 2020 and reply filed by September 10, 2020.

We appreciate the Court's consideration of this request. Due to the fact that we do not have access to our physical files, it has been more difficult to gather the necessary documents to prepare the motion papers. Also, one of the individual defendants is outside the United States, making communication and execution of his declaration more difficult. Finally, due to the witnesses' and counsel's schedules, the two continued depositions contemplated in the joint letter filed on June 5, 2020 [Dkt. No. 49] could not be taken until late June and we are awaiting one of the transcripts.

This is the third request for an adjournment of the Motion briefing schedule.

Application GRANTED.

SO ORDERED.

Date: 07/08/2020

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE



The Honorable Valerie E. Caproni  
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Respectfully yours,

SEYFARTH SHAW LLP

*/s/ Cameron Smith*

Cameron Smith

cc: All counsel of record (via ECF)